

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MARTIN K. MICHELMAN,]
Plaintiff,]
]
v.]
]
SUFFOLK COUNTY, SUFFOLK]
COUNTY SHERIFF'S DEPARTMENT,]
and ANDREA J. CABRAL, In Her Official]
And Individual Capacities,]
Defendants.]
]

Civil Action No. 05-CV-11577-RGS

**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)
PROPOSED JOINT SCHEDULING MANAGEMENT PLAN**

1. Proposed by Plaintiff and Defendants:

Automatic Document Disclosure under Local Rule 26.2(A) to be done exchanged by January 16, 2006.

2. Proposed by Plaintiff and Defendants:

The parties will serve their written discovery requests, exclusive of Requests for Admissions, on or before March 1, 2006.

3. Proposed by Plaintiff and Defendants:

The parties will complete all depositions of fact witnesses, including Rule 30(b)(6) witnesses, by June 15, 2006.

4. Proposed by Plaintiff and Defendants:

The Parties will provide disclosure of non-damages experts in accordance with Fed. R. Civ. P 26(a)(2) by June 30, 2006. Rebuttal experts, if any, will be disclosed in accordance with Fed. R. Civ. P. 26(a)(2) by July 14, 2006.

5. Proposed by Plaintiff and Defendants:

Dispositive motions shall be filed by August 28, 2006. Oppositions to Summary Judgment Motions will be due four (4) weeks after the Motion is filed. Reply Briefs if any will be due one (1) week thereafter.

6. Proposed by Plaintiff and Defendants:

The parties propose that a Case Management Conference will be held pursuant to Local Rule 16.3 on November 17, 2006 provided that the Court has ruled on the Motions for Summary Judgment, for the purpose of exploring the possibility of settlement, for establishing the identification of expert witnesses on the issue of damages, for the scheduling of this matter for Final Pre-Trial Conference and for Trial, and for all other matters deemed appropriate by the Court.

7. Proposed by Plaintiff and Defendants:

The parties propose that a trial by jury be scheduled in the winter 2006.

8. Proposed by Plaintiff and Defendants:

The parties do not consent at the present time to a trial before a Magistrate Judge.

Respectfully submitted,

For the Plaintiff,

For the Defendant,

/s/ Robert S. Mantell
Robert S. Mantell
Rodgers, Powers & Schwartz, LLP
18 Tremont Street
Boston, MA 02108
(617) 742-7010

/s/ Kathleen M. Cawley
Kathleen M. Cawley
Suffolk County Sheriff's Department
200 Nashua Street
Boston, MA 02114
(617) 961-6680

Date: November 23, 2005